

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE STREET GROUP, LLC

*Plaintiff and Counterclaim-  
Defendant,*

v.

MILLENNIUM MANAGEMENT LLC,  
DOUGLAS SCHADEWALD, and  
DANIEL SPOTTISWOOD

*Defendants.*

Civil Action No. 1:24-cv-02783

**DECLARATION OF BRIAN R. CAMPBELL IN SUPPORT OF DEFENDANTS'  
LETTER MOTION TO COMPEL INTERROGATORY RESPONSES**

I, Brian R. Campbell, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a senior attorney at the law firm of Elsberg Baker & Maruri, PLLC, counsel for Defendants Douglas Schadewald and Daniel Spottiswood. I am a member in good standing of the Bar of the State of New York and admitted to practice in the Southern District of New York.

2. I respectfully submit this Declaration in Support of Defendants' Letter Motion to Compel Interrogatory Responses. I am personally familiar with the facts included in this declaration.

3. Attached hereto as Exhibit 1 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS00186489-JS00186498.

4. Attached hereto as Exhibit 2 is a demonstrative containing data sourced from a spreadsheet produced in this action by Jane Street bearing Bates Number JS00667949, with additional formatting, summation, and annotations.

5. Attached hereto as Exhibit 3 is a true and correct copy of a spreadsheet produced in this action by Jane Street bearing Bates Numbers JS00667949.

6. Attached hereto as Exhibit 4 is a true and correct copy of a deficiency letter regarding Interrogatory No. 3, dated August 29, 2024, from Defendants' counsel to Plaintiff's counsel.

7. Attached hereto as Exhibit 5 is a true and correct copy of a letter in response to Defendants' letter regarding Interrogatory No. 3, dated September 13, 2024, from Plaintiff's counsel to Defendants' counsel.

8. Attached hereto as Exhibit 6 is a true and correct copy of Jane Street's Initial Disclosures dated May 31, 2024.

9. Attached hereto as Exhibit 7 is a true and correct copy of Defendants' First Set of Interrogatories to Plaintiff dated June 7, 2024.

10. Attached hereto as Exhibit 8 is a true and correct copy of Jane Street's Responses And Objections To Defendants' First Set Of Interrogatories dated June 28, 2024.

11. Attached hereto as Exhibit 9 is a true and correct copy of Jane Street's Second Supplemental Responses And Objections to Defendants' First Set of Interrogatories dated July 31, 2024.

12. Attached hereto as Exhibit 10 is a true and correct copy of an email dated July 5, 2024, from counsel for the Individual Defendants to counsel for the Plaintiff.

13. Attached hereto as Exhibit 11 is a true and correct copy of an email dated July 17, 2024, from counsel for the Individual Defendants to counsel for the Plaintiff.

14. Attached hereto as Exhibit 12 is a true and correct copy of an email dated September 4, 2024, from counsel for the Individual Defendants to counsel for the Plaintiff.

15. Attached hereto as Exhibit 13 is a true and correct copy of an email dated September 6, 2024, from counsel for the Plaintiff to counsel for Defendants.

16. The parties discussed Jane Street's response to Interrogatory 3 by e-mails dated July 3, 2024, (*supra* ¶ 12, Ex. 10 at 6-7) and July 17, 2024, (*supra* ¶ 13, Ex. 11). Defendants also sent Jane Street a letter on this issue dated August 29, 2024, (*supra* ¶ 6, Ex. 4). The parties met and conferred concerning this issue by telephonic conference on July 5, July 22, and September 9, 2024 (*supra* ¶ 15, Ex. 13 at 1), following which the Plaintiff memorialized its position at Defendants' request by letter dated September 13, 2024 (*supra* ¶ 7, Ex. 5). The parties have been unable to resolve their disagreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on October 2, 2024.

/s/ Brian R. Campbell  
Brian R. Campbell